

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE CHINA MEDIAEXPRESS HOLDINGS,
INC. SHAREHOLDER LITIGATION

Civil Action No. 11-cv-0804 (VM)

This Document Relates to:
ALL ACTIONS

CLASS ACTION

ECF Case
Electronically Filed

PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Lead Plaintiffs Irrevocable Trust FBO Lansing Davis and the Davis Partnership LP (collectively, the "Davis Entities" or the "Lead Plaintiff"), and additional plaintiffs John Haughton, Ethan Lamar Pierce and John Shaffer (collectively, the "Class Representatives") respectfully move the Court for an order granting preliminary approval of the proposed Settlement with Defendant Deloitte Touche Tohmatsu (Hong Kong Partnership) ("DTT").

In support of this motion, the Class Representatives submit: 1) the accompanying memorandum in support of this motion; 2) Exhibit A (along with attachments A-1, A-2 and A-3 to Exhibit A) and Exhibit B to the accompanying memorandum; and 3) the accompanying Declaration of Karl P. Barth in support of this motion.

DATED: May 5, 2015

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Karl P. Barth
Steve W. Berman
Karl P. Barth
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
karlb@hbsslaw.com

Jason A. Zweig (JZ-8107)
HAGENS BERMAN SOBOL SHAPIRO LLP
One Penn Plaza, 36th Floor
New York, NY 10119
Telephone: (212) 752-5455
Facsimile: (917) 210-3980
jasonz@hbsslaw.com

Reed R. Kathrein
Peter E. Borkon
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
reed@hbsslaw.com
peterb@hbsslaw.com

Lead Counsel for the Class

Michael Eisenkraft (ME-6974)
COHEN MILSTEIN SELLERS & TOLL PLLC
88 Pine Street, 14th Floor
New York, NY 10005
Telephone: (212) 838-7797
Facsimile: (212) 838-7745
meisenkraft@cohenmilstein.com

Steven J. Toll
Julie Goldsmith Reiser
S. Douglas Bunch (SB-3028)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue, N.W.
West Tower, Suite 500
Washington, DC 20005-3964
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
stoll@cohenmilstein.com
jreiser@cohenmilstein.com
dbunch@cohenmilstein.com

Co-counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that I am the ECF User whose ID and password are being used to electronically file the foregoing with the Clerk of the Court using the CM/ECF system on May 5, 2015, which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Karl P. Barth

KARL P. BARTH

Mailing Information for a Case 1:11-cv-00804-VM-GWG

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Karl P. Barth**
karlb@hbsslaw.com
- **Gary Frederick Bendinger**
gbendinger@sidley.com,nyefiling@sidley.com
- **Jeffrey A. Berens**
jeff@dyerberens.com
- **Steve W. Berman**
steve@hbsslaw.com,carrie@hbsslaw.com,jeniphr@hbsslaw.com,nicolleg@hbsslaw.com
- **Jeniphr Breckenridge**
jeniphr@hbsslaw.com
- **Stephen Douglas Bunch**
dbunch@cohenmilstein.com,efilings@cohenmilstein.com
- **Donald Howard Chase**
dchase@morrisoncohen.com,courtntotices@morrisoncohen.com
- **Patrick Vincent Dahlstrom**
pdahlstrom@pomlaw.com
- **Marshall Pierce Dees**
mdees@holzerlaw.com
- **Michael Benjamin Eisenkraft**
meisenkraft@cohenmilstein.com,efilings@cohenmilstein.com
- **Robert Craig Finkel**
rfinkel@wolfpopper.com,cdunleavy@wolfpopper.com,mgianfagna@wolfpopper.com,nmackiel@wolfpopper.com
- **Savvas Antonios Foukas**
foukas@hugheshubbard.com
- **Lionel Z. Glancy**
lglancy@glancylaw.com,mmgoldberg@glancylaw.com,csadler@glancylaw.com,pbinkow@glancylaw.com,info@glancylaw.com,rprongay@glancylaw.com
- **David Andrew Gordon**
dgordon@sidley.com,efilingnotice@sidley.com
- **Marc Ian Gross**
migross@pomlaw.com
- **Jonathan Richard Horne**
jhorne@rosenlegal.com
- **Reed Richard Kathrein**
reed@hbsslaw.com,peterb@hbsslaw.com,pashad@hbsslaw.com,sf_filings@hbsslaw.com
- **Phillip C. Kim**
pkim@rosenlegal.com
- **Eugene R. Licker**
elicker@loeb.com,nydocket@loeb.com,tcummins@loeb.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,lpvega@pomlaw.com
- **William R. Maguire**
maguire@hugheshubbard.com
- **Michael Edward Marr**
mmarr@marrlaw.com
- **Kim Elaine Miller**
kim.miller@ksfcounsel.com,dawn.hartman@ksfcounsel.com,kimmiller225@yahoo.com
- **David S. Nalven**
davidn@hbsslaw.com,Seanh@hbsslaw.com,grega@hbsslaw.com,dakotas@hbsslaw.com

- **Julie Goldsmith Reiser**
jreiser@cohenmilstein.com
- **Laurence Matthew Rosen**
lrosen@rosenlegal.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Miles Norman Ruthberg**
miles.ruthberg@lw.com,rachel.feld@lw.com,jessica.bengels@lw.com,elizabeth.evans@lw.com
- **Gazeena Kaur Soni**
gsoni@sidley.com,nyefiling@sidley.com
- **Steven Jeffrey Toll**
stoll@cohenmilstein.com,efilings@cohenmilstein.com
- **Laura Maines Vasey**
lvasey@loeb.com,nydocket@loeb.com,tcummins@loeb.com
- **Michael Dana Warden**
mwarden@sidley.com,cqureshi@sidley.com,nyefiling@sidley.com,lkelemen@sidley.com,dcefilingsnotice@sidley.com
- **Jason Allen Zweig**
jasonz@hbsslaw.com,peterb@hbsslaw.com,reed@hbsslaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Michael Goldberg
Glancy Binkow & Goldberg, LLP (CA)
1801 Avenue of the Stars
Suite 311
Los Angeles, CA 90067

Howard G. Smith
Smith & Smith
3070 Bristol Pike
Bensalem, PA 19020